

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

YOUSSEF RAMADAN,

Defendant.

CASE NO. 17-20595

HON. MARIANNE O. BATTANI

DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION TO EXTEND MOTION CUT-OFF DATE

NOW COMES Yousef Ramadan, by and through his attorney, Andrew Densemo, and in response to the government's Motion to Extend the Motion Cut-Off Date states as follows.

1. Mr. Ramadan has previously stipulated to two prior governmental requests to extend motion filing deadlines. The most recent of which was filed March 20, 2018.

2. Mr. Ramadan through counsel consented to each one of the government's prior request for additional time to respond without any pre-conditions.

3. Defense counsel replied to the most recent request to extend by indicating its willingness to stipulate once more if the government complied with

some of the discovery requests made by the defense. The government was unwilling to do so.

4. The defense motions were filed on March 2, 2018 and March 5, 2018. Additional time was requested by the plaintiff and stipulated to by the defense, based on dates suggested by the government. The government has not explained why it failed to meet the filing deadlines or its need for additional time. The defense was willing to stipulate to additional time but the government was unwilling to agree to any of the requests made by the defense. Given the timing of the government's request and its rejection of overtures by the defense to resolve long-standing discovery issues, the Court should deny the government's request for additional time.

WHEREFORE, Defendant prays that this Honorable Court will deny the Plaintiff's request for another extension of the Motion Cut-off Date.

Respectfully submitted,

FEDERAL DEFENDER OFFICE

s/Andrew Densemo
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Dated: March 23, 2018

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CERTIFICATE OF SERVICE

I, hereby certify that on March 23, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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FEDERAL DEFENDER OFFICE

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